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Canada

Post: Ottawa

Health Canada Public Comment for EBDC Fungicides

Report Categories:

Agricultural Situation

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Report Highlights:

On July 19, 2018, Canada proposed eliminating maximum residue limits for four fungicides commonly used in horticultural production; Codex and/or U.S. tolerances remain in place for two products. Canada is accepting public comments on the proposal until October 2, 2018.

Keywords: Canada, CA18048, MRL, fungicide, EBDC

Summary

On July 19, Health Canada's Pest Management Regulatory Agency (PMRA) opened a public comment period for proposed maximum residue limits (MRL) for ethylene bis-dithiocarbamate (EBDC) fungicides: mancozeb, metiram, maneb, and zineb. Under the current proposal, MRLs for the four EBDC fungicides would be revoked, defaulting to a tolerance of 0.1 ppm for relevant commodities with the exception of potatoes, where a 0.2 ppm MRL is proposed for mancozeb and metiram. The comment period will remain open until **October 2, 2018**.

A consultation summary can be found on [Health Canada's website](#). Comments may be submitted electronically through the [PMRA Publications Section](#) referencing "Consultation on Ethylene bis-dithiocarbamate (EBDC) Fungicides: Mancozeb, Metiram, Maneb, and Zineb, Proposed Maximum Residue Limit PMRL2018-27."

Background

EBDC fungicides are used preventatively across many fruit, vegetable, nut, and field crops. Earlier PMRA evaluations cancelled all food uses of [maneb](#) and [zineb](#) in Canada. Dietary assessments of [mancozeb](#) and [metiram](#) indicated human health risks for all food uses with the exception of foliar application on potatoes. The July 19 proposal follows previous recommendations to revoke MRLs for all EBDC fungicides. If revoked, according to Canada's Food and Drug Regulations ([B.15.002\(1\)](#)), MRLs for all crops would default to 0.1 ppm. Based on the human health risk evaluations and consultations, PMRA has proposed an exception for potatoes, which would have an MRL of 0.2 ppm for both mancozeb and metiram.

Following the public consultation and any revisions to the proposal, final MRL changes would appear in Canada's [Maximum Residue Limit Database](#). MRLs are considered to be legally in effect on the date of publication in or removal from the MRL Database. PMRA's consultation document notes that, to prevent disruption of trade, any revocation of MRLs would take effect in such a manner as to allow sufficient time for commodities that were legally treated to clear trade channels.

Table 1 and 2 compare the differences in MRLs between Canada, the United States, and Codex by respective commodity for mancozeb and metiram. PMRA notes that there were no established tolerances or MRLs listed for maneb or zineb for the United States under the Electronic Code of Federal Regulations or the Codex Alimentarius Pesticide Index, therefore MRL comparisons were not possible.

Table 1- Comparison of MRLs for Mancozeb

Food Commodity	Canadian MRL (ppm)	American Tolerance (ppm)	Codex MRL (ppm)
Apples	Revoked 7 ppm MRL Footnote 1	0.6	5 (Pome fruits)
Broccoli	Revoked 7 ppm MRL Footnote 1	7	Not established
Cabbage	Revoked 7 ppm MRL Footnote 1	9	5
Cucumbers	Revoked 4 ppm MRL Footnote 1	2.0 (Vegetable, cucurbit, group 9)	2
Grapes	Revoked 7 ppm MRL Footnote 1	1.5	5
Lettuce	Revoked 7 ppm MRL Footnote 1	3.5 (Lettuce, head)	0.5 (Head lettuce)
		18 (Lettuce, leaf)	10 (Leaf lettuce)
Dry bulb onions	Revoked 0.5 ppm MRL Footnote 1	1.5	0.5
Pears	Revoked 7 ppm MRL Footnote 1	0.6	5 (Pome fruits)
Peppers	Revoked 7 ppm MRL Footnote 1	12	Not established
Tomatoes	Revoked 4 ppm MRL Footnote 1	2.5	2

Footnote 1

Following the revocation of the EBDC MRLs, all crops will be regulated under subsection B.15.002(1) of the Food and Drug Regulations, which requires that residues not exceed 0.1 ppm.

Table 2- Comparison of MRLs for Metiram

Food Commodity	Canadian MRL (ppm)	American Tolerance (ppm)	Codex MRL (ppm)
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Apples	Revoked 7 ppm MRL Footnote1	0.5	5 (Pome fruits)
Grapes	Revoked 7 ppm MRL Footnote1	5 (Grape, wine)	5

Footnote 1

Following the revocation of the EBDC MRLs, all crops will be regulated under subsection B.15.002(1) of the Food and Drug Regulations, which requires that residues not exceed 0.1 ppm.

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